

ANDERSON KILL P.C.

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Application granted in its entirety. The Clerk of Court is respectfully requested to terminate the pending letter-motions (Docs. 87, 88).

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
July 20, 2023

Re: *United States v. Williams, et al. (Elijah Briggs)*
Dkt.: 22 Cr 641 (PMH)

Hon. Philip M. Halpern
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Dear Judge Halpern:

I am counsel for Defendant Elijah Briggs in the above matter, assigned to this matter pursuant to the Criminal Justice Act. On July 18, 2023, I filed a request for additional services, and my request was confusing, in part duplicative, and not helpful. I therefore respectfully ask to withdraw my prior request [Dkt. 87].

Relevant to my application, from January 1, 2013 through February 14, 2023, I was a partner at Fasulo Braverman & Di Maggio, LLP, and under that firm I accepted assignment under the Criminal Justice Act for this matter. On February 15, 2023, I became a shareholder (partner) at Anderson Kill, P.C. Sean McCabe was an associate of mine at my prior firm and joined AK with me on February 15, 2023. Michael Giordano was an associate of mine at my prior and did not come with me to Anderson Kill, and so he has no further involvement in this matter since the date I switched firms.

Therefore, I write to the Court with several specific requests:

1. I request that Docket Entry 87 (Letter Motion from Sam Braverman requesting various services under the CJA) be withdrawn.
2. On December 16, 2022, this Court previously authorized me to use Michael Giordano as an associate in this matter and to bill CJA at the rate of \$110/hour. I request that Mr. Giordano be terminated from this case effective February 14, 2023.
3. On December 16, 2022, this Court previously authorized me to use Sean McCabe as an associate in this matter and to bill CJA at the rate of \$110/hour. I request that Mr. McCabe be continued in this case at that rate.

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4. I request that Jade Sobh, an associate in my current firm Anderson Kill also be authorized to work on this matter, and at the same \$110/hour rate as for Mr. McCabe.
5. I will oversee the associates' work, have them keep track individually of the hours spent, and return to the Court when and if the total reaches 100 hours.
6. I request approval for the appointment of an investigator to assist me in the preparation of this matter. An investigator would be invaluable to obtain leads for evidence, serve subpoenas and FOIL requests, and to interview witnesses. I request 50 hours of investigator time to be paid at the prevailing CJA rate.
7. I request permission to file interim vouchers in this matter as there is an enormous amount of discovery to be reviewed in this case.

If you have any questions, please do not hesitate to contact me. I have attached the resumes of Sean McCabe and Jade Sobh to this request. I thank the Court for its consideration.

Very truly yours,

Sam Braverman

Samuel M. Braverman
National Co-Chair
Government Enforcement,
Internal Investigations, and
White-Collar Defense Group

SMB/jp
Encl (2)